

**UNITED STATES BANKRUPTCY COURT**

**FOR THE**

**EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

In the Matter of:

CLARA ROBIN WILKERSON

Debtor

Chapter 13

Case No. 17-13280-KHK

**OBJECTION TO CONFIRMATION OF MODIFIED PLAN,**  
**NOTICE OF OBJECTION TO CONFIRMATION OF MODIFIED PLAN**  
**AND**  
**NOTICE OF SCHEDULED HEARING ON THIS OBJECTION**

Thomas P. Gorman, Chapter 13 Trustee, has filed this objection to confirmation of your Chapter 13 Modified Plan filed April 19, 2018. The cause for this objection is as follows:

**Violation of 11 U.S.C. §1325(b)(1)(B) - Disposable Income.**

**Violation of 11 U.S.C. §1325(a)(6) - Feasibility.**

**Violation of 11 U.S.C. §1325(a)(3) - Good Faith.**

- Debtor has not yet provided filed 2017 tax returns.

**Violation of 11 U.S.C. §1325(a)(6) - Feasibility -**

-Step payment from \$180.00 per month to \$1,670.00 per month in month 9 is completely unrealistic and does not tie to the date or amount of her car payment that will cease during Plan term.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not wish the court to grant the relief sought in the objection, or if you want the court to consider your views on the objection, then on or before five business days prior to the hearing date, you or your attorney must:

File with the court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). Unless a written response and supporting memorandum are filed and served by the date specified, the Court

**Notice of Objection To Confirmation**

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may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above. You must mail a copy to the persons listed below.

***Attend the hearing to be held on June 7, 2018 at 9:30 a.m. in Courtroom II on the 2<sup>nd</sup> floor, United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314.*** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

A copy of any written response must be mailed to the following persons:

Thomas P. Gorman  
300 North Washington Street, Ste, 400  
Alexandria, VA 22314

Clerk of the Court  
United States Bankruptcy Court  
200 South Washington Street  
Alexandria, VA 22314

If you or your attorney do not take steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: May 22, 2018

/s/ Thomas P. Gorman  
Thomas P. Gorman  
Chapter 13 Trustee  
300 N. Washington Street, #400  
Alexandria, VA 22314  
(703) 836-2226  
VSB 26421

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this 22<sup>nd</sup> day of May, 2018, served via ECF authorized users or mailed a true copy of the foregoing Objection to Confirmation, Notice of Objection and Notice of Hearing to the following parties.

Clara robin Wilkerson  
Chapter 13 Debtor  
17992 Swans Creek Lane  
Dumfries, VA 22026

Tommy Andrews, Jr., Esq.  
Attorney for Debtor  
122 N. Alfred St.  
Alexandria, VA 22314

/s/ Thomas P. Gorman  
Thomas P. Gorman